



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

February 2, 2024

**BY ECF**

Honorable Lorna G. Schofield  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

**Re: United States v. Patel, 23 Cr. 543 (LGS)**

Dear Judge Schofield:

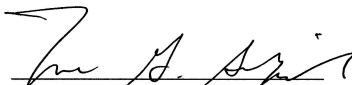
Pursuant to the Court's November 8, 2023, Order ([Dkt. 8](#)), the Government submits the following update on the status of review of electronic devices and to jointly request an adjournment of the current motions schedule.

Later today or Monday, the Government will produce responsive data from the four computers and three cellphones seized from the defendant's home pursuant to a search warrant at the time of the defendant's arrest. The production of discovery from the electronic devices will at that point be complete, and the production of discovery overall will be substantially complete.<sup>1</sup>

The discovery in the case is voluminous, and the parties are engaged in plea negotiations. The parties therefore jointly move to adjourn the motions deadline currently set for March 4, 2024, by approximately 60 days. The defendant consents to the exclusion of time under the Speedy Trial Act through the new deadline, and such an exclusion is in the interest of justice to permit the

Application Granted. Defendant's motion(s) shall be filed by **May 3, 2024**. The Government's response shall be filed by **May 17, 2024**. Defendant's reply shall be filed by **May 24, 2024**. The status conference currently scheduled for April 22, 2024, is adjourned to **June 24, 2024, at 10:30 a.m.** The Court finds that the ends of justice served by excluding the time between April 22, 2024, and June 24, 2024, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. § 3161(h)(7)(A) because the exclusion will give Defendant time to review the discovery, file any motions, and allow the parties to discuss a potential pretrial disposition. It is hereby ORDERED that the time between April 22, 2024, and June 24, 2024, is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 17.

Dated: February 5, 2024  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

<sup>1</sup> The significant remaining item of discovery is a set of recordings that may involve the defendant, which were created in the course of a separate investigation by a separate law enforcement agency.

defense to review the discovery and consider a possible pretrial disposition in this case. 18 U.S.C. § 3161(h)(7).

Respectfully submitted,

DAMIAN WILLIAMS  
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Southern District of New York

by: /s/Kevin Mead  
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CC: Counsel of Record (by ECF)